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Sent via ECF and E-Mail
Honorable Judge Gallagher

Re.: Amor *et al* vs. Conover
Civil Action No: 21-cv-05574-JMG

Dear Honorable Judge Gallagher:

We respond to Defendant's blithe comment that Dr. Amor is 'widely recognized as a public figure and is treated as such.' Plaintiffs have been tolerant of Ms. Conover's failure to school herself in the law and apply it, in addition to her unrestrained creation of facts that do not exist and cannot be proven.

Defendant regularly makes sweeping, unfounded statements as if they are a *fait accompli*. Her latest correspondence to the Court is such an example. Ms. Conover's creation of public controversy is entirely from the Plaintiffs' defamation suit, something the law does not permit. Plaintiffs have not inserted themselves into a public controversy because no "public controversy" pre-existed. Plaintiffs' defamation suit

Defendant continually assures the Court that her evidence says this-or her evidence says that-without ever producing such evidence. Her latest letter is another example of the same. Now Defendant states that Dr. Amor interferes with the independent acts when there is no 'evidence' he

does any such thing. There is no evidence that Dr. Amor has fired at least three of her witnesses. Defendant has failed to establish whether Dr. Amor had the right or authority to fire anyone.

Although having had ample opportunity, Defendant has not come close to sustaining her burden that the Plaintiffs should be regarded as limited-purpose public figures.

Her motion should be denied, as previously argued.

Also, during the preparation for trial we have found duplicate Exhibits on the part of the Defendant causing total confusion. When I referred to “Duplicate Exhibits”, an example of this is Exhibit B. Defendant has theses various documents marked as Exhibit B:

1. A notarized Affidavit of Samantha Snow.
2. A notarized Gmail from James Amor to Brianna Kube notifying her that a contract would not be offered for the 2022 season.
3. A typed Questionnaire for Brianne Kube which is notarized; and
4. Exhibit B marked as “Communications/Emails with Shawn Howland, former Cast member of the Pittsburgh Renaissance Festival”

I understand that the Defendant chose to represent herself Pro Se, however she still has the responsibility, as your Honor has explained to the Defendant previously, that Court has rules and guidelines. Defendant Conover also express when she stated she was going to pursue this matter Pro Se that she did have an attorney to give her guidance and direction.

Our office staff has been providing information and links to the Defendant to assist her with the various procedures such as Subpoenas, how to set up depositions and the requirements of depositions and Honors your Policies and Procedure Guidelines. We understand the difficulty that she has undertaken, however we are on the eve of trial and lack of clarity of what the

Defendant is using as exhibits at trial is prejudicial to the Plaintiffs. Plaintiffs cannot properly prepare their witnesses, and neither can they be assured that the disk they will be filing with the Court is an accurate reflection of Ms. Conover's Exhibits. Ms. Conover represented that she would send us a complete list this evening. However, as of the time of writing we have not received anything to my knowledge. I have no doubt the Court understands this situation makes it difficult for the Plaintiff to prepare the disk for the Court

Thank you in advance for you time, attention, and handling of these matters. Should you have any questions or need discussion, it may be something that can be handled after jury selection.

Respectfully,

KOLMAN LAW, P.C.

Timothy M. Kolman
Timothy M. Kolman, Esquire

TMK/sds